

Permitting & Assistance Branch Staff Report
Revised Solid Waste Facilities Permit for
Alameda County Industries Transfer/Processing Facility
SWIS No. 01-AA-0290
December 21, 2011

Background Information, Analysis, and Findings:

This report was developed in response to the Alameda County Department of Public Health, Local Enforcement Agency's (LEA) request for the Department of Resources Recycling and Recovery (Department) concurrence on the issuance of a proposed revised Solid Waste Facilities Permit (SWFP) for the Alameda County Industries Transfer/Processing Facility, and operated by Alameda County Industries, LLC. A copy of the proposed permit is attached. The report contains Permitting & Assistance Branch staff's analysis, findings, and recommendations.

The proposed permit was initially received on August 10, 2011. The LEA requested the operator waive the timelines to address CalRecycle staff comments on the proposed permit package. New proposed permits were received on November 17, 2011 and November 28, 2011. Action must be taken on this permit no later than January 27, 2011. If no action is taken by January 27, 2011, the Department will be deemed to have concurred with the issuance of the proposed revised SWFP.

Proposed Changes

The following changes to the permit are being proposed:

	Current Permit (2007)	Proposed Permit
Permitted Hours of Operation	<p>Receipt of Refuse/Waste and Direct Transfer Facility: 5:00 a.m. to 5:00 p.m. Monday – Friday, inbound MSW and outbound MSW up to 1:00 a.m. in order to transfer MSW within 8 hours.</p> <p>Material Recovery Facility: 5:00 a.m. to 3:30 p.m., Mon-Fri, with occasional work on weekends.</p> <p>Office Hours: 8:00 a.m. to 5:00 p.m., Monday thru Friday.</p>	<p>Direct Transfer Facility – Receipt and Transfer of Materials/Wastes: 5:00 a.m. to 6:00 p.m., Monday to Friday, inbound and outbound MSW up to 2:00 a.m. in order to transfer within 8 hours of receipt.</p> <p>Material Recovery Facility: a. Receipt and Transfer of Materials: 5:00 a.m. to 6:00 p.m., Monday to Friday with occasional overtime work on weekends (Saturdays, 5:00 a.m. to 6:00 p.m.) b. Processing of Materials: 5:00 a.m. to 10:00 p.m., Monday to Saturday</p> <p>Office Hours: 8:00 a.m. to 5:00 p.m., Monday to Friday</p> <p>Maintenance Hours: 24 hours a day</p>
Permitted Maximum Tonnage	<p>Total: 412 Tons Per Day (tpd) 150 tpd average of MSW maximum (Direct Transfer)</p> <p>80 tpd average of Greenwaste and greenwaste co-collected with food waste maximum</p> <p>50 tpd average of Construction and Demolition waste maximum</p>	<p>Total: 412 Tons Per Day</p> <p>280 TPD from the Transfer Facility (maximum)</p>

	132 tpd average of commingled recyclable material maximum	
Permitted Traffic Volume	193 Vehicle trips per day – round trips	193 Vehicles per day – round trips
Key Design Parameters	Permitted Total Acreage – 2.17 acres Design Capacity – 592 Tons	Permitted Total Acreage – 2.17 acres Design Capacity – 802 Tons Per Day
Legal Description of the Facility	37°42'37/07" N, 122°09'05.06" W, APN 77B-800-15	The legal description of this facility is contained in pages 5-7 of the Transfer/Processing Report dated May 2011, Revised October 2011. 37°42'37/07" N, 122°09'05.06" W, APN 77B-800-15
Findings	<p>a. This permit is consistent with the Alameda County Waste Management Authority Plan, which was approved by the CIWMB on April 24, 1996. The location of the facility is identified in the Nondisposal Facility Element, pursuant to Public Resources Code (PRC), Section 50001 (a). Previously, a finding of conformance was determined by the Alameda County Waste Management Authority on November 28, 2001, Resolution #2001-15 for the Direct Transfer Facility.</p> <p>b. This permit is consistent with the standards adopted by the CIWMB, pursuant to PRC 44010.</p> <p>c. The design and operation of the facility is consistent with the State Minimum Standards for Solid Waste Handling and Disposal as determined by the enforcement agency, pursuant to PRC 44009.</p> <p>d. The City of San Leandro Fire Department has determined that the facility is in conformance with applicable fire standards pursuant to PRC, 44151.</p> <p>e. A Negative Declaration was filed with the State Clearinghouse (SCH #2007-012055) and approved by the City of San Leandro on February 15, 2007. The Negative Declaration describes and supports the design and operation, which will be authorized by the issuance of this permit. A Notice of Determination was filed with the State Clearinghouse on February 23, 2007.</p>	<p>a. This permit is consistent with the <u>Alameda County Waste Management Authority Plan</u>, which was approved by CalRecycle on April 24, 1996. The location of the facility is identified in the <u>Nondisposal Facility Element</u>, pursuant to Public Resources Code (PRC), Section 50001 (a).</p> <p>b. This permit is consistent with the standards adopted by the CalRecycle, pursuant to PRC 44010.</p> <p>c. The design and operation of the facility is consistent with the State Minimum Standards for Solid Waste Handling and Disposal as determined by the enforcement agency, pursuant to PRC 44009.</p> <p>d. The <u>City of San Leandro Fire Department</u> has determined that the facility is in conformance with applicable fire standards pursuant to PRC, 44151.</p> <p>e. A <u>Negative Declaration</u> was filed with the State Clearinghouse (SCH #2007-012055) and approved by the <u>City of San Leandro</u> on <u>February 15, 2007</u>. The Negative Declaration describes and supports the design and operation, which will be authorized by the issuance of this permit. A Notice of Determination was filed with the State Clearinghouse on <u>February 23, 2007</u>.</p>
Prohibitions	The permittee is prohibited from accepting the following wastes: Hazardous, radioactive, medical (as defined in Chapter 6.1 Division 20 of the Health and Safety Code), liquid, designated, or other wastes requiring special treatment or handling,	The permittee is prohibited from accepting the following wastes: Hazardous, radioactive, medical (as defined in Chapter 6.1 Division 20 of the Health and Safety Code), liquid, designated, or other wastes requiring special treatment or handling, except as identified in

	except as identified in the Report of Facility Information and approved amendments thereto and as approved by the enforcement agency and other federal, state, and local agencies.	the Report of Facility Information and approved amendments thereto and as approved by the enforcement agency and other federal, state, and local agencies.
The following documents describe and/or restrict the operation of this facility.	<p>TPR – January 17, 2007 Amended – April 22, 2007</p> <p>NPDES WDID No. 2011015900 – June 29, 2000</p> <p>Negative Declaration (SCH #2007-012055) January 10, 2007</p> <p>Land Use and/or Conditional Use Permit CU-95-10 – August 17, 1995 CU-96-18 – October 17, 1996 CU-97-7 – July 7, 1997 PLN2001-00049 – August 8, 2001 PLN2006-00061 – February 17, 2007</p>	<p>TPR – January 2011, Revised October 2011</p> <p>NPDES WDID No. 2011015900 – June 29, 2000</p> <p>Negative Declaration (SCH #2007-012055) Feb. 15, 2007</p> <p>Land Use and/or Conditional Use Permit CU-95-10 – August 17, 1995 CU-96-18 – October 17, 1996 CU-97-7 – July 7, 1997 PLN2001-00049 – August 2, 2001 PLN2006-00061 – February 15, 2007 Minor modification to CUP PLN2006-00061 – November 16, 2010 Notice of Exemption – January 4, 2011 Clarification of 11/16/10 approval – September 26, 2011</p>
Self Monitoring	<p>Program a. The types and quantities (in tons) of waste, including separated or commingled recyclables, entering the facility per day. Reporting Frequency – Quarterly</p> <p>Program b. The number and types of vehicles using the facility per day. Reporting Frequency – Quarterly</p> <p>Program c. Results of the hazardous waste load checking program, including the quantities and types of hazardous waste, medical wastes or otherwise prohibited waste found in the waste stream and the disposition of these materials. Reporting Frequency – Record in Operating Records</p> <p>Program d. Copies of all written complaints regarding this facility and the operator's actions taken to resolve these complaints. Reporting Frequency – Notify LEA within 24 hours, Written Report Quarterly</p> <p>Program e. Log of Special Occurrences, which includes records of fires, explosion, injury and property damage accidents, flooding, incidence of unlawful disposal of prohibited</p>	<p>Program a. The types and quantities (in tons) of waste, including separated or commingled recyclables, entering the facility per day. Reporting Frequency – Monthly</p> <p>Program b. The number and types of vehicles using the facility per day. Reporting Frequency – Monthly</p> <p>Program c. Results of the hazardous waste load checking program, including the quantities and types of hazardous waste, medical wastes or otherwise prohibited waste found in the waste stream and the disposition of these materials. Reporting Frequency – Record in Operating Records</p> <p>Program d. Copies of all written complaints regarding this facility and the operator's actions taken to resolve these complaints. Reporting Frequency – Notify LEA within 24 hours, Written Report Quarterly</p> <p>Program e. Log of Special Occurrences, which includes records of fires, explosion, injury and property damage accidents, flooding, incidence of unlawful disposal of prohibited material and other unusual events, such as facility closure</p>

	<p>material and other unusual events, such as facility closure with brief description of the response to and resolution of occurrence. Includes visits by regulatory agencies. Reporting Frequency – Daily (Maintain log availability for LEA Inspection)</p> <p>Program f. The type and quantities (in tons) of material, including waste, recovered recyclables, etc that are transferred from the facility per day. Reporting Frequency – Quarterly</p> <p>Program g. Documentation for all self-monitoring programs that are described in the facility Transfer and Processing Report. Reporting Frequency – Provide upon request by the LEA</p> <p>Program h. Maintain a log of training for employees that need special training e.g., asbestos, hazardous material and Biohazardous material handling. Reporting Frequency – Record in Operating Records, (Maintain records availability for LEA Inspection)</p>	<p>with brief description of the response to and resolution of occurrence. Includes visits by regulatory agencies. Reporting Frequency – Daily (Maintain log availability for LEA Inspection)</p> <p>Program f. The type and quantities (in tons) of material, including waste, recovered recyclables, etc that are transferred from the facility per day. Reporting Frequency – Monthly</p> <p>Program g. Documentation for all self-monitoring programs that are described in the facility Transfer and Processing Report. Reporting Frequency – Provide upon request by the LEA</p> <p>Program h. Maintain a log of training for employees that need special training e.g., asbestos, hazardous material and Biohazardous material handling. Reporting Frequency – Record in Operating Records, Provide upon request by the LEA.</p>
LEA Conditions	<p>a. The operator shall comply with all State Minimum Standards for Solid Waste Handling and Disposal as specified in Title 14, California Code of Regulations.</p> <p>b. The operator shall maintain a log of special/unusual occurrences. This log shall include, but is not be limited to, fires, explosions, the discharge and disposition of hazardous or unpermitted waste, and significant injuries, accidents or property damage. Each log entry shall be accompanied by a summary of any actions taken by the operator to mitigate the occurrence. The log shall be available to site personnel and the Local Enforcement Agency (LEA) at all times.</p> <p>c. Additional information concerning the design and operation of the facility shall be furnished upon request within the time frame specified by the LEA.</p> <p>d. The maximum permitted daily tonnage for this facility is 412 tons per day total (see breakdown at section 4c) and shall not receive more than this amount without a revision of this permit.</p>	<p>a. The operator shall comply with all State Minimum Standards for solid waste handling and disposal as specified in Title 14, California Code of Regulations.</p> <p>b. The operator shall maintain a log of special/unusual occurrences. This log shall include, but is not be limited to, fires, explosions, the discharge and disposition of hazardous or unpermitted waste, and significant injuries, accidents or property damage. Each log entry shall be accompanied by a summary of any actions taken by the operator to mitigate the occurrence. The log shall be available to site personnel and the Local Enforcement Agency (LEA) at all times.</p> <p>c. Additional information concerning the design and operation of the facility shall be furnished upon request within the time frame specified by the LEA.</p> <p>d. The maximum permitted daily tonnage for this facility is 412 tons per day total, with no more than 280 per day at the Transfer Facility and shall not receive more than this amount without a revision of this permit.</p>

	<p>e. This permit is subject to review by the EA and may be suspended, revoked, or revised at any time for sufficient cause.</p> <p>f. The LEA reserves the right to suspend or modify waste receiving and handling operations when deemed necessary due to an emergency, a potential health hazard, or the creation of a public nuisance.</p> <p>g. Any change that would cause the design or operation of the facility not to conform to the terms and conditions of this permit is prohibited. Such a change may be considered a significant change, requiring a permit revision. In no case shall the operator implement any change without first submitting a written notice of the proposed change, in the form of an RFI amendment, to the LEA at least 180 days in advance of the change.</p> <p>h. A copy of this permit and the Transfer Processing Report shall be maintained at the facility.</p> <p>i. Records of employee training for health and safety, operation and maintenance of this site shall be maintained on the site and be available for inspection by the LEA.</p> <p>j. Stored recyclables shall neither interfere with facility operations nor cause a public health nuisance. The LEA reserves the authority to reduce the maximum storage time of recyclables as necessary to protect public health and minimize odors, litter, vectors and other nuisances.</p> <p>k. All boxes, bins, loading docks, tipping floors or other waste containers including waste transport vehicles shall be cleaned on a regular schedule to prevent a public health hazard or nuisance caused by litter, odor or vectors.</p> <p>l. Municipal solid waste, including green waste commingled with food waste material awaiting transfer shall not be stored on site for longer than 8 hours and shall be transported to a facility in compliance with Title 14 and Title 27.</p> <p>m. Prohibited waste that is inadvertently received at the facility shall be managed in accordance with procedures that are outlined in the transfer processing report and in compliance with all applicable laws and regulations.</p>	<p>e. This permit is subject to review by the EA and may be suspended, revoked, or revised at any time for sufficient cause.</p> <p>f. The LEA reserves the right to suspend or modify waste receiving and handling operations when deemed necessary due to an emergency, a potential health hazard, or the creation of a public nuisance.</p> <p>g. Any change that would cause the design or operation of the facility not to conform to the terms and conditions of this permit is prohibited. Such a change may be considered a significant change, requiring a permit revision. In no case shall the operator implement any change without first submitting a written notice of the proposed change, in the form of an RFI amendment, to the LEA at least 180 days in advance of the change.</p> <p>h. A copy of this permit and the Transfer Processing Report shall be maintained at the facility.</p> <p>i. Records of employee training for health and safety, operation and maintenance of this site shall be maintained on-site and be available for inspection by the LEA.</p> <p>j. Stored recyclables shall neither interfere with facility operations nor cause a public health nuisance. The LEA reserves the authority to reduce the maximum storage time of recyclables as necessary to protect public health and minimize odors, litter, vectors and other nuisances.</p> <p>k. All boxes, bins, loading docks, tipping floors or other waste containers including waste transport vehicles shall be cleaned on a regular schedule to prevent a public health hazard or nuisance caused by litter, odor or vectors.</p> <p>l. Municipal solid waste, including green waste commingled with food waste material awaiting transfer shall not be stored on site for longer than 48 hours and shall be transported to a facility in compliance with Title 14 and/or Title 27.</p> <p>m. Prohibited waste that is inadvertently received at the facility shall be managed in accordance with procedures that are outlined in the Transfer/Processing Report and in compliance with all applicable laws and regulations.</p>
--	---	---

	<p>n. The applicant, Alameda County Industries, shall secure all required permits and approvals from other regional, state and local agencies prior to the commencement of operations. Copies of permits and approvals shall be provided to the ELA upon issuance.</p> <p>o. The maximum permitted vehicle trips per day for this facility is 193, and shall not exceed this amount without a revision of this permit.</p> <p>p. Municipal solid waste or recyclable material that is inadvertently dropped onto the loading dock during the truck-to-truck transfer of waste material must be cleaned up immediately.</p>	<p>n. The maximum permitted vehicle trips per day for this facility is 193, and shall not exceed this amount without a revision of this permit.</p> <p>o. Municipal solid waste or recyclable material that is inadvertently dropped onto the loading dock during the truck-to-truck transfer of waste material must be cleaned up immediately.</p> <p>p. The LEA reserves the right to implement mitigation measures to minimize noise and other nuisances from the operation of equipment or processing of materials/wastes at the site as necessary to protect public health, safety or the environment.</p>
--	---	--

Findings:

Staff recommends concurrence in the issuance of the proposed revised SWFP. All of the required submittals and findings required by Title 27, California Code of Regulations (27 CCR), Section 21685 have been provided and made. Staff has determined that the California Environmental Quality Act (CEQA) requirements have been met to support concurrence. The findings that are required to be made by the Department when reaching a determination are summarized in the following table. The documents on which staff's findings are based have been provided to the Branch Chief with this Staff Report and are permanently maintained by the Permits and Certification Division.

27 CCR Sections	Findings	
21685(b)(1) LEA Certified Complete and Correct Report of Facility Information	The LEA provided the required certification in their permit submittal letter dated November 17, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(2) LEA Five Year Permit Review	The existing permit was issued in July 2007; therefore a Five Year Permit Review is not due or required at this time. Note: Any future permit modification or revision of this permit will require a Five Year Permit Review.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(3) Solid Waste Facility Permit	The LEA submitted a proposed Solid Waste Facilities Permit on November 28, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685 (b)(4)(A) Consistency with Public Resources Code 50001	The LEA in their permit submittal package received on August 10, 2011, provided a finding that the facility is consistent with PRC 50001. Waste Evaluation & Enforcement Branch (WEEB) staff in the Jurisdiction Product & Compliance Unit found the facility is identified in the Non-Disposal Facility Element and with the Countywide Integrated Waste Management Plan, as described in the memorandum dated August 19, 2011.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

27 CCR Sections	Findings	
21685(b)(8) Operations Consistent with State Minimum Standards	WEEB staff in the Inspections and Enforcement Agency Compliance Unit found that the facility was in compliance with all operating and design requirements during an inspection conducted on September 13, 2011. See compliance history below for details.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21685(b)(9) LEA CEQA Finding	The LEA provided a finding in their permit submittal package received on November 17, 2011, that the proposed permit is consistent with and supported by the existing CEQA documentation. See details below.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
21650(g)(5) Public Notice and/or Meeting, Comments	A Public Informational Meeting was held by the LEA on July 26, 2011. No written comments were received by LEA or Department staff. No one from the general public was in attendance.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable
CEQA Determination to Support Responsible Agency's Findings	The Department is a responsible agency under CEQA with respect to this project. Permitting and Assistance Branch staff has determined that the CEQA record can be used to support the Branch Chief's action on the proposed revised SWFP.	<input checked="" type="checkbox"/> Acceptable <input type="checkbox"/> Unacceptable

Compliance History:

WEEB staff in the Inspection and Enforcement Agency Unit conducted a pre-permit inspection on September 13, 2011. Staff found that the facility is in compliance with applicable state minimum standards and permit conditions.

Since the issuance of the permit in 2007, the LEA has noted two violations of the Public Resources Code (PRC), Section 44004 – Significant Change in September 2010. No other violations have been noted.

Environmental Analysis:

Under CEQA, the Department must consider, and avoid or substantially lessen where possible, any potentially significant environmental impacts of the proposed revised SWFP before the Department concurs in it. In this case, the Department is a Responsible Agency under CEQA and must utilize the environmental document prepared by the City of San Leandro, Board of Zoning Adjustments, acting as Lead Agency, absent changes in the project or the circumstances under which it will be carried out that justify the preparation of additional environmental documents and absent significant new information about the project, its impacts and the mitigation measures imposed on it.

Alameda County Industries Transfer/Processing Facility currently operates under a SWFP issued by the Local Enforcement Agency on July 24, 2007. The proposed revised SWFP under consideration is to increase the permitted hours of operation for the Receipt and Transfer of Materials/Wastes in the Direct Transfer Facility to 5:00 a.m. – 6:00 p.m., Monday to Friday, inbound and outbound MSW up to 2 a.m., in order to transfer with 8 hours of receipt; increase the permitted hours of operation in the Material Recover Facility for the Receipt and Transfer of Materials to 5:00 a.m. to 6:00 p.m., Monday to Friday with occasional overtime work on weekends (Saturdays, 5:00 a.m. – 6:00 p.m.); processing of Materials to 5:00 a.m. to 10:00 p.m.,

Monday to Sunday; allow for 280 TPD to be processed through the direct transfer facility; remove specific daily tonnages while keeping the limit of 412 tons per day for the whole site; allow the facility to operate on Labor Day; revise the TPR to reflect new equipment; and clarify operations and material types, etc.

A Negative Declaration, State Clearinghouse No. 2007-012055, was adopted by the City of San Leandro on February 15, 2007 and a Notice of Determination was filed with the State Clearinghouse on February 23, 2007.

On November 16, 2010, the City of San Leandro approved a minor modification to the Conditional Use Permit per day allocations and hours of operation. On January 4, 2011, the City of San Leandro issued a Notice of Exemption (NOE) per Section 15301, "Existing Facility." The NOE was for a minor modification to the Conditional Use Permit Approval (PLN2006-00061) to remove specific daily tonnages allocated by waste-type categorization, but not to exceed the currently permitted maximum 412 tons per day for the entire facility, and to allow for a change to the hours of operation with regards only to on-site processing of recyclables at the Materials Recovery Facility to allow for a second shift to work as late as 10 p.m.

The County of Alameda, Department of Environmental Health Office of Solid/Medical Waste Management Care Agency (LEA) has provided a finding that the proposed revised Solid Waste Facilities Permit is consistent and supported by the cited environmental document.

Staff recommends that the Department, acting as a Responsible Agency under CEQA, utilize the environmental documents as prepared by the San Leandro Board of Zoning Adjustments in that there are no grounds under CEQA for the Department to prepare a subsequent or supplemental environmental document or assume the role of Lead Agency for its consideration of the revised Solid Waste Facilities Permit. Department staff has reviewed and considered the CEQA findings adopted by the San Leandro Board of Zoning Adjustments. Department staff recommends the Negative Declaration together with the CEQA findings, are adequate for the Branch Chief's environmental evaluation of the proposed project for those project activities which are within the Department's expertise and/or powers, or which are required to be carried out or approved by the Department.

CalRecycle staff further recommends that the Department, acting as a Responsible Agency under CEQA, prepare a Notice of Exemption, based on the Categorical Exemption for existing facilities, to be filed with the State Clearinghouse after the Department's concurrence of the revised SWFP in that the proposed permit is to be issued to an existing facility that will not expand or significantly change its operations beyond that existing. Further, there are no grounds under CEQA for the Department to prepare an environmental document or assume the role of Lead Agency for its consideration of the proposed revised SWFP.

The administrative record for the decision to be made by the Department includes the administrative record before the LEA, the proposed revised Solid Waste Facilities Permit and all of its components and supporting documentation, this staff report, the Negative Declaration and Notice of Exemption adopted by the Lead Agency, and other documents and materials utilized by the Department in reaching its decision on concurrence in, or objection to, the proposed revised Solid Waste Facilities Permit. The custodian of the Department's administrative record is Dona Sturgess, Legal Office, Department of Resources Recycling and Recovery, P.O. Box 4025, Sacramento, CA 95812-4025.

Local Issues:

The project document availability, hearings, and associated meetings were noticed consistent with the SWFP requirements. A review from the public process indicates that environmental justice issues were not identified by the surrounding community (Census Tract 4332). 2010 Census information indicates that the surrounding population is approximately 51.3% White, 9.9% African American, 0.8% American Indian and Alaska Native, 23.0% Asian, 0.9% Native Hawaiian and Other Pacific Islander, 8.5% some other race, and 5.8% two or more races. 20.1% of the total population describe themselves as Hispanic or Latino. 9.2% of the families are below the poverty level. Staff has not identified any local issues related to this item. Staff finds the project and permit process to be consistent with Government Code Section 65040.12, as there has been fair treatment of people of all races, cultures, and incomes with respect to the proposed action being recommended above.

Public Comments:

The LEA held a public informational meeting on July 26, 2011, at Alameda County Industries Meeting Room, located at 610 Aladdin Ave., in the City of San Leandro. No members of the public were in attendance. No written comments were received by the LEA or Department staff.

The Department staff provided an opportunity for public comment during the CalRecycle Monthly Public Meeting on December 13, 2011.

Department Staff Actions:

Staff has worked with the LEA throughout the permit process by providing comments on permitting documents and responding to questions.